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5 Attorney for: Debtor REYMUNDO A. GARZA

6
7 UNITED STATES BANKRUPTCY COURT
8 FOR THE EASTERN DISTRICT OF CALIFORNIA

9)	CASE NO.: 20-10489-B-13
10)	
REYMUNDO A. GARZA)	Chapter 13
11)	
)	DCN: BDB-2
12)	
)	DATE: APRIL 15, 2020
13)	TIME: 9:30 a.m.
Debtor.)	PLACE: U.S. Bankruptcy Court
14)	2500 Tulare Street,
)	5th Floor, Court Room 13
15)	Fresno, CA 93721
)	JUDGE: RENÉ LASTRETO II
16)	

17 **MOTION TO VALUE COLLATERAL OF**
18 **WELLS FARGO DEALER SERVICES, INC.**

19 1. The Debtor hereby moves for the entry of an order valuing the property described
20 below. This property secures the claim of the creditor named below. Debtor moves for an order
21 that the amount of the creditor's secured claim not exceed the value of its security. This
22 determination, if made, will supersede any greater secured claim demanded in a proof of claim.
23 Any objections to the creditor's claim are reserved and will be filed after the creditor has filed a
24 proof of claim. In the opinion of the Debtor, the collateral has the replacement value indicated
25 below.

26 2. The name of the creditor whose collateral is being valued by this motion is
27 WELLS FARGO DEALER SERVICES, INC.
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1 3. The collateral that is the subject of this motion consists of the Debtor's property
2 described as a 2016 Hyundai Veloster, 31,000 miles, in fair condition. Debtor declares the
3 purchase date of the vehicle was over 910 days from the filing of the petition.

4 4. Debtor's opinion of the collateral's "replacement value" [as defined and limited
5 by section 506(a)(2)] is \$13,025.00. Debtor's opinion is based on the age and condition of the
6 vehicle, as well as a valuation from NADA GUIDE VALUE, which places a retail value of
7 \$13,025.00.

8 5. The Debtor's opinion of value is based on personal knowledge of the vehicle as
9 owner and familiarity with the vehicle and like vehicles of the same make, model and age and
10 the NADA Guides retail value online report attached in Exhibit A.

11 6. Wherefore, Debtor prays for an order valuing the creditor's secured claim at
12 \$13,025.00.

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14 Dated: March 17, 2020

BARCO LAW, A Professional Corporation

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17 /s/ Benny D. Barco, Esq.

18 BENNY D. BARCO, ESQ.,
19 Attorney for Debtor
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